


DEPARTMENT OF TRANSPORTATION STATE OF GEORGIA

INTER-DEPARTMENT CORRESPONDENCE

DATE: October 21, 2016

FROM:  Eric Duff, State Environmental Administrator

TO: Division of Engineering Offices/Division of Program Delivery/GDOT Districts/Consultant Relations Committee

SUBJECT: Plan Lockdown Schedules

On October 15, 2013, the Chief Engineer issued a directive (see attached) establishing schedules for plan submittal to the Office of Environmental Services (OES) for the preparation of Section 404 and Stream Buffer Variance (BV) applications. Per this directive, no impact changes to Waters of the US or State protected buffers can be made (lockdown date) once plans have been submitted to OES.

Plan changes made after the scheduled lockdown date will be rejected by OES; these submittals must be accompanied with Director of Engineering approval. In addition, lockdown plan submittals occurring after the schedule date must copy the Director to ensure he/she is made aware of the missed schedule.

The annual plan lockdown schedule (see attached 2017 schedule) circulated by OES further notes that careful consideration should be given to "hot button changes" made following the completion of environmental technical studies. "Hot button changes" can trigger revised environmental technical studies and thus have the potential to delay environmental certifications for Let. These changes include:

- Changes in right-of-way, easement or construction limits within any environmentally sensitive area (ESA);
- An increase in right-of-way (ROW) or easement that extends beyond the original Environmental Survey boundary;
- An extension of project termini;
- A change to a drainage structure within an ESA;
- A shift in the vertical or horizontal alignment or edge of pavement along the mainline or a side road, even if the shift occurs within existing ROW;
- An update to traffic volumes, the addition or removal of through, auxiliary, or passing lanes; and,
- The addition of a signal; or any other changes that would alter the project description.

All environmental technical studies and agency consultations conducted as a result of these changes must be complete prior to preparing the Section 404 and BV applications. Thus, receiving lockdown plans that require updating studies, preparing addenda and reopening agency consultations will delay applications and project schedules; we therefore request that plans with "hot button changes" be submitted to OES at least four weeks prior to the scheduled lockdown date. Since environmental certifications are due 11 weeks prior to Let, receiving lockdown plans 31 weeks prior to Let allows just 20 weeks to complete the following: prepare and review applications; submit applications to agencies; application review by agencies; agency public notice; agency preparation and approval of the Section 404 permit or BV; and, acquisition of mitigation credits. This tight 20 week period does not provide adequate time to also update studies, prepare addenda and conduct agency consultations.

If you have any questions concerning this matter, please contact me at 404-631-1071 or eduff@dot.ga.gov.